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December 21, 2012

By ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Government Employees Ins. Co., et al. v. Hazel, et al.
Docket No. CV 11-0410 (CBA)(RML)
RR File No.: 005100-00029

Dear Magistrate Judge Scanlon:

As the Court is aware, we represent Plaintiffs Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company and GEICO Casualty Company (collectively "Plaintiffs" or "GEICO") in this matter.

Pursuant to the Court's November 13, 2012 Status Report Order, I write to provide a joint report on the status of discovery. Plaintiffs tried on several occasions to reach Defendants regarding this joint letter, but were unable to do so.

Though document discovery has commenced, significant document discovery and depositions remain outstanding as the result of displacement and delays attendant to Hurricane Sandy. However, we expect that it will be possible to complete discovery in this action by March 15, 2012. We therefore respectfully request an extension of time in which to complete discovery, until March 15th.

In the interim, we believe that it may be possible to resolve this action through settlement and, toward that end, we respectfully request that the Court schedule a settlement conference in the near term, on a date that is convenient for the Court.

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We appreciate the Court's attention to this matter.

Respectfully submitted,

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FPT/kd

cc: All counsel via ECF
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